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18  
19 **UNITED STATES DISTRICT COURT**  
20  
21 **CENTRAL DISTRICT OF CALIFORNIA**  
22  
23 **EASTERN DIVISION – RIVERSIDE**

24 SAVE OUR FOREST ASSOCIATION,  
25 INC.

26 Plaintiff,

27 vs.

28 UNITED STATES FOREST SERVICE, *et*  
*al.*,

Defendants.

Case No.: 5:24-cv-01336

**STIPULATION FOR PROPOSED  
BRIEFING SCHEDULE**

Action Filed: June 25, 2024

Trial Date: March 31, 2026

1 WHEREAS, on August 27, 2024, Plaintiff Save Our Forest Association, Inc.  
2 (“SOFA”) filed its First Amended Complaint for Injunctive and Declaratory Relief”  
3 [ECF No. 24];

4 WHEREAS, Defendants filed their Answer on November 8, 2024 [ECF No.  
5 29];<sup>1</sup>

6 WHEREAS, SOFA and the Defendants (“Parties”) wish to minimize their  
7 procedural disputes and proceed to resolution of this case in an expedited, yet orderly,  
8 manner by having the Court set a schedule for briefing dispositive motions and cross-  
9 motions for summary judgment;

10 NOW THEREFORE, the Parties hereby stipulate and agree, and request that  
11 the Court enter an order setting the following schedule:

- 12 1. No later than August 8, 2025, Federal Defendants will provide Plaintiff Save  
13 Our Forest Association (“SOFA”) with an indexed proposed Administrative Record  
14 for this matter;
- 15 2. No later than August 15, 2025, SOFA will notify Federal Defendants of any  
16 issues regarding the proposed content of the Administrative Record;
- 17 3. No later than August 22, 2025, the Parties shall complete any conferral  
18 attempting to resolve any differences they may have regarding the proposed content  
19 of the Administrative Record;
- 20 4. No later than September 5, 2025, Defendants shall lodge with the Court, in  
21 PDF format on an external hard drive, the Administrative Record for this case,  
22 providing SOFA with a copy on the same day;
- 23 5. The Administrative Record shall only be lodged electronically with the Court  
24 via external hard drive; it will not be filed via CM/ECF;

25  
26  
27 <sup>1</sup> On March 6, 2025, Yuhaaviatim of San Manuel Nation (“Nation”) filed a Motion to Intervene and  
28 Motion to Dismiss [ECF No. 38], and the Court issued its Civil Trial Scheduling Order [ECF No. 40];

1 6. If SOFA wishes to challenge the content and/or sufficiency of the  
2 Administrative Record, it shall notice and file a motion no later than 21 days after the  
3 lodging of the Administrative Record. Any disputes regarding the sufficiency, scope,  
4 content, or supplementation of the Administrative Record that were not raised during  
5 consultation of the Parties and by motion by this deadline will be deemed to have  
6 been waived;

7 7. All briefing by Federal Defendants shall be joint.

8 8. On or before the 30th day after the later of the lodging of the Administrative  
9 Record, or final resolution of any Administrative Record motion filed pursuant to  
10 Paragraph 6 above, whichever is later, Plaintiff shall file its summary judgment  
11 papers, including a statement of undisputed facts (“SUF”), with SOFA’s facts and  
12 disputes numbered,<sup>2</sup> and with the memorandum of points and authorities not to  
13 exceed 25 pages;

14 9. On or before 60 days after the filing of SOFA’s Summary Judgment Papers,  
15 Defendants shall file their cross motion for summary judgment and opposition to  
16 SOFA’s motion for summary judgment and accompanying SUF/Statement of  
17 Genuine Disputes of Material Fact, and with the memorandum in support thereof not  
18 to exceed 30 pages;

19 10. On or before 60 days after the filing of Defendants’ cross motion/opposition,  
20 SOFA shall file its opposition/reply thereto, of no more than 20 pages along with an  
21 accompanying Statement of Genuine Disputes of Material Fact;

22 11. On or before 30 days after the filing of SOFA’s opposition/reply, Defendants  
23 shall file their reply, of no more than 15 pages;

24 12. Any claims or defenses available at the time but not raised during summary  
25 judgment briefing will be deemed to have been waived;

26

27

28 <sup>2</sup> The Parties shall follow the direction in this Court’s standing order of March 24, 2016.

1 13. Because the schedule presented above for production and judicial review of the  
2 merits of Plaintiff's claims based on the Administrative Record in accordance with  
3 the Administrative Procedure Act ("APA"), 5 U.S.C. § 706, is intended to be the full  
4 procedure for resolving this case on the merits, the Parties respectfully request that  
5 the Court vacate its March 6, 2025 "Civil Trial Scheduling Order," ECF No. 40.

6 14. Notwithstanding the immediately preceding paragraph, Plaintiff reserves the  
7 right to petition this Court for admission of extra-record evidence.  
8

9 Dated: July 14, 2025

Respectfully Submitted,

11 By: /s/ Rachel S. Doughty

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17 *Attorneys for Plaintiff*

18 Dated: July 14, 2025

Respectfully Submitted,

20 By: /s/ Andrew A. Smith

21 UNITED STATES DEPARTMENT OF  
22 JUSTICE

23 Andrew A. Smith

24 Natural Resources Section

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28

Pursuant to Local Rule 5-4.3.4, I hereby attest that each of the other signatories concurs in the filing of this document.

Dated: July 14, 2025

/s/ Rachel S. Doughty  
Rachel S. Doughty

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

/s/ Jessica San Luis

Jessica San Luis